



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

421 Aviation Way • Frederick, MD 21701-4798
Telephone (301) 695-2000 • FAX (301) 695-2375
www.aopa.org

June 10, 2004

U.S. Department of Transportation
Docket Management System
400 7th Street, SW, Room PL-401
Washington, DC 20590-0001

RE: Docket No. FAA-2004-17041 Noise Stringency Increase for Single-Engine Propeller-Driven Small Airplanes; Proposed Rule

The Aircraft Owners and Pilots Association (AOPA), representing over 400,000 general aviation pilots and professionals nationwide submits the following comments to the proposed Noise Stringency Increase for Single-Engine Propeller-Driven Small Airplanes dated February 11, 2004.

The FAA's Environment and Energy (AAE) office is proposing to tighten the noise standards of small propeller-driven airplanes to harmonize them with current ICAO standards. This proposed rule, if implemented will have an adverse financial and safety impact on general aviation aircraft and owners. AOPA is concerned that this proposal was drafted by the AAE office without the input from representatives of the general aviation community especially the holders of Supplemental Type Certificates (STC). Additionally, we are concerned that this proposal was not coordinated within the FAA with those offices responsible for overseeing the issuances of STCs and so, the impact of this proposal may have been severely underestimated.

AOPA recommends that the FAA limit its proposed noise stringency increase for single-engine propeller-driven airplanes to newly type certificated (TC) airplanes only and exclude STCs from the new rule. Historically, changes to aircraft design requirements such as the installation of shoulder harnesses and Flight Data Recorders in applicable aircraft have applied to aircraft with type certificates issued after the change in regulations. AOPA also requests the AAE office coordinate this proposed rule with FAA offices responsible for the oversight of aircraft certification and the issuances of STCs. At a minimum, the FAA offices with oversight authority must be given an opportunity to evaluate the impact of the proposed rule on STCs.

The FAA, in this proposed rule, seeks to increase the existing noise stringency standards for the certification of single-engine propeller driven small airplanes. It proposes to change 14 CFR 36.301 by requiring a 6 dBA noise limit reduction for single-engine propeller-driven airplanes having a maximum take-off weight less than 1,257 lb. (570 kg) and a 3 dBA noise limit reduction for airplanes with weights above 3,307 lb. (1,500 kg). The noise limit would increase at a rate of 10.75 db per doubling of weight between 1,257 lb. and 3,307 lb. This new standard would be applicable to TCs and STCs issued beginning November 4, 2004. According to the

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proposal, these changes would make the FAA's single-engine propeller-driven small airplanes noise regulation more consistent with international standards.

AOPA is particularly concerned with this proposal as it relates to the development of STCs for general aviation aircraft. Today's average general aviation aircraft is 30 years old and many rely on STCs to allow for continued upgrades. These continued upgrades, including engine and propeller modifications, add to the performance and safety of the operations of these aircraft. The FAA should be promoting the development of these STCs and not hindering them with this type of regulatory change. By imposing this limitation, the FAA is inhibiting the continued development of STCs paramount to the continued safe operations of general aviation aircraft.

AOPA appreciates the efforts of the FAA to solicit input from industry before proceeding with this proposed rule, however we submit that the proposal should be fully researched with those FAA offices responsible for the oversight of aircraft certification and the issuances of STCs. We restate our request that the FAA limit its proposed Noise Stringency Increase for Single-Engine Propeller-Driven Small Airplanes and the FAA offices impacted be contacted to evaluate its impact on STCs.

Sincerely,

A handwritten signature in dark ink, appearing to read "Luis M. Gutierrez", with a stylized flourish at the end.

Luis M. Gutierrez
Director, Regulatory and Certification Policy
Aircraft Owners and Pilots Association

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